

EXHIBIT A

From: Bender, Kristin <KBender@willkie.com>
Sent: Thursday, July 3, 2025 4:52 PM
To: Pohlman, Daniel J.; Breed, Maxwell; Connolly, Michaela; Taustine, Melissa; Adams-Jack, Autumn; Roeser, Stephanie
Cc: Enkeshafi, Parmida
Subject: RE: Case/Koslow Subpoenas - Lighthouse

Hi Dan,

Thank you again for the initial search term list. Please see below for our additions/adjustments to the proposed search terms. We are happy to work with you, for example if there are spam hits, etc. We'll await further thoughts and updates on processing.

Thanks,
 KB

--

- Blake OR Lively OR Blake's OR Lively's OR BL OR BL's OR Blakel
- Ryan OR Reynolds OR Ryan's OR Reynolds' OR Reynolds's OR RR OR RR's
- Justin OR Baldoni OR Justin's OR Baldoni's OR JB OR JB's
- "It Ends With Us" OR IEWU OR "It Ends W/ Us" OR "It Ends W Us" OR film OR movie OR "August 6" OR "August 9" OR ISWU OR set OR premiere OR screening OR junket
- "Betty Buzz" OR "Blake Brown" OR "Betty Booze" OR BBB (Blake w/10 Brown) OR (betty w/10 (buzz OR booze))
- Aviation OR "Mint Mobile" OR "Maximum Effort Productions" OR "Max Effort" OR Wrexham OR (Mint w/10 Mobile) OR Aviation OR "Alpine F1" OR (club w/10 nexaca) OR nexaca OR nuvei OR wealthsimple OR (wealth w/10 simple)
- Wayfarer OR Wayfarer's
- Sarowitz OR Sarowitz's OR Steve OR Steve's OR Stephen OR Stephen's
- Jamey OR Jamie OR Jamye OR Health OR Health's OR JH
- Jed OR Wallace OR Jed's OR Wallace's OR "Street Relations" OR SR OR Hawaii OR Hawai'i OR (Source* /3 intelligence)
- Jen OR Jenn OR Jen's OR Jenn's OR Abel OR Abel's
- Sony OR "Marketing Plan" OR market OR marketing OR marketed OR markets OR DV OR (domestic w/10 violence) OR victim OR hope OR triumph
- Lawsuit OR litigate OR litigation OR litigates OR Liman OR SDNY OR court OR Liner OR Freedman OR Freedman's OR Friedman OR Friedman's OR Brian OR Brian's OR Bryan OR Bryan's OR "attack dog" OR underdog OR battle OR legal OR BF
- "Megyn Kelly" OR "Megan Kelly" OR Candace OR Billy OR Bush or Andy OR Signore OR "Popcorned Planet" OR Perez OR Hilton OR Mario OR Lavandeira OR Kjertsi OR Flaa OR Perez OR "Sara Nathan" OR "Sarah Nathan" OR Vituscka OR ((James OR Jim) w/50 Vituscka) OR "red seat"
 - Please search the following as recipients as well as search terms: Candace Owens, Billy Bush, Andy Signore, Popcorned Planet, Perez Hilton, Mario Lavandeira
- Untraceable OR secret OR covert OR anonymous OR anonymity OR "personally identifiable information" OR PII OR conceal OR obscure OR obscures OR obscured OR invisible or "digital expert" or "digital team"
- (PR OR "press relation" OR crisis OR crises) AND (policy OR policies OR procedure OR procedures OR standard OR standards OR plan OR plans OR manual OR handbook)
- "What to avoid" OR "stay away from" OR "thanks to TAG" OR "tides are turning" OR truth OR backlash OR justice OR unjust OR survivor OR abuser OR abuse OR rift
- Scooter OR Braun

- Algorithm OR algorithms OR bot OR bots
- "Strategy doc*" OR "execution doc*" OR "messaging point*"
- "Dream team" OR "PR Threat w/TAG" OR "TAG TEAM" OR "JB PR (W/O JB)"
- "Scenario plan" OR "scenario planning" OR "crisis management" OR "rapid response" OR "if/then" OR (negative w/10 (story OR stories OR press)) OR defense OR (scenario /2 doc) OR (scenario /2 document) OR dramatic OR aggressive OR victim OR destroy OR ruin OR bury OR buried OR mess OR confused OR confusing OR (strategy /2 doc*) OR Taylor OR TS OR advocates OR positioning OR position OR briefing OR unfollowed OR weaponize*
- ("social media" OR digital OR social OR online OR internet OR tabloid OR tabloids OR Facebook OR instagram OR insta OR twitter OR tweet OR tweets OR Reddit OR Snapchat OR Snap OR "Snap chat" OR youtube OR tiktok OR "tik tok" OR discord OR blog* OR influencer OR press OR troll OR trolls OR public OR podcast) w/100 (mitigate OR mitigation OR mitigates OR post OR posts OR posted OR posting OR comment OR like OR hashtag OR story OR stories OR live OR reel OR episode OR leak OR leaks OR leaked OR counter OR counters OR counteract OR manipulate OR influence OR remediate OR plant OR plan OR project OR narrative OR angle OR engage OR contract OR agree OR consult OR strategize OR strategy OR campaign OR scheme OR boost OR seed OR use OR bury OR buried)
- HR OR "human resources" OR investig* OR complaint OR grievance* OR concern OR concerns OR report* OR demand (workplace w/30 (misconduct OR safety)) OR CRD OR "civil right*"
- harass* OR discriminat* OR *retaliat* OR "equal opportunity" OR "corrective action*" OR illegal OR unlawful* OR fire OR firing OR apology OR apologize OR sex* OR consent OR kiss* OR lip OR assault* OR touch* OR gaze OR breastfeed* OR breastfed OR "breast feed" OR "child birth" OR childbirth OR nurs* OR pregnan* OR *partum* OR genitalia OR penis OR porn* OR derogat* OR *approp* OR *comfort* OR nude OR nudity OR naked OR intimate OR intimacy OR objectif* OR defam* OR destroy* OR payback OR revenge OR cancel* OR target* OR discredit* OR ruin* OR abuser OR hurt* OR criticism OR criticiz* OR toxic OR problematic OR nightmare OR victim* OR difficult OR crazy OR nuts OR worst OR "birthing scene" OR OR bitch* OR slut OR cunt OR boob* OR affair* OR bully* OR bullied OR princess OR diva OR mean OR whine OR whining OR fat OR weigh* OR diet OR chubb* OR thin OR skinny
- Hoover OR Jenny OR Slate OR Isabela OR Isabella OR Ferrer OR Brandon OR Sklenar OR Plank OR Hasan

Kristin Bender

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From: Bender, Kristin <KBender@willkie.com>

Sent: Thursday, July 3, 2025 3:25 PM

To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>

Cc: Enkeshafi, Parmida <PENkeshafi@pryorcashman.com>

Subject: RE: Case/Koslow Subpoenas - Lighthouse

Thanks, Dan.

We are further revising our proposed search terms in light of the list you suggested yesterday, and will send them as soon as possible this afternoon.

Best,
Kristin

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From: Pohlman, Daniel J. <dpohlman@pryorcashman.com>
Sent: Thursday, July 3, 2025 1:50 PM
To: Bender, Kristin <KBender@willkie.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>
Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>
Subject: RE: Case/Koslow Subpoenas - Lighthouse

*** EXTERNAL EMAIL ***

Hi Kristin, first, to update you on status- my understanding is that processing of the data is still ongoing.

Second, I was wondering whether you had managed to come up with your own proposed search terms.

Last, in terms of timing, we are considering your suggestion. In any event, what constitutes a reasonable extension under the circumstances will depend both on the amount of data reviewed and when that data is actually available to us for review.

—
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

From: Bender, Kristin <KBender@willkie.com>
Sent: Wednesday, July 2, 2025 8:15 PM
To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>
Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>
Subject: RE: Case/Koslow Subpoenas - Lighthouse

Thanks for the update, Dan.

We are amenable to a reasonable extension to account for the good-faith progress to date. Given that Ms. Lively's deposition is set for July 17, we propose July 14 (i.e., a week extension) so that we will have the minimum time necessary to process and review the productions at a high level before that deposition. Let us know if that works.

We will circle back on the proposed terms (thank you) asap tomorrow, which I understand is when processing may be completed such that search terms can then be run.

Best,
KB

Kristin Bender

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From: Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Sent: Wednesday, July 2, 2025 2:21 PM

To: Bender, Kristin <KBender@willkie.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>

Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

Subject: RE: Case/Koslow Subpoenas - Lighthouse

*** EXTERNAL EMAIL ***

Kristin,

As an update following your suggestion to connect post-collection, as of yesterday, on-premises collections for both custodians were completed.

We spoke with the team at Lighthouse, and they do not expect processing to be complete until tomorrow at earliest.

Given the upcoming holiday weekend, and the fact that the parties have not yet discussed search terms, a production deadline of July 7 is no longer feasible despite our good faith efforts. Accordingly, we request a reasonable extension. We believe Wednesday, July 16 is appropriate. Please let us know if you disagree. To the extent we cannot agree on a mutual extension, we will request relief from the Court.

In an effort to move this process forward promptly and in good faith, we have prepared a list of proposed search terms for your review. We will provide search term hit information when it is available to us.

- Blake
- Lively
- Ryan
- Reynolds
- Justin
- Baldoni
- "It Ends With Us"
- IEWU
- "Betty Buzz"
- "Blake Brown"
- Aviation
- "Mint Mobile"
- "Maximum Effort Productions"
- Wayfarer
- Sarowitz

Best,
Dan

—
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

From: Bender, Kristin <KBender@willkie.com>

Sent: Friday, June 27, 2025 4:07 PM

To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>

Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

Subject: RE: Case/Koslow Subpoenas - Lighthouse

Hi Dan,

Thank you for the update, we appreciate it. I understand that on-site collection is necessary, and that based on your clients' availability the collections will take place next week. The vendor also indicated that they can conduct on-site collections over the weekend if that aligns with availability for your clients.

We understand that you are working in good faith to meet the deadline, and we will likewise work with you in good faith and in light of any challenges posed with processing time, the July 4 holiday, etc. I propose we touch base after collections, once you all have a perspective on volume, review, etc., and we can determine what the timeline (with any necessary extension) looks like. We also welcome any continued updates and I am around today or tomorrow if you would like to discuss anything.

Thanks,
Kristin

Kristin Bender

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From: Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Sent: Friday, June 27, 2025 2:25 PM

To: Bender, Kristin <KBender@willkie.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>

Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

Subject: RE: Case/Koslow Subpoenas - Lighthouse

*** EXTERNAL EMAIL ***

Kristin,

Following up on the below and to keep you apprised – Willkie's request for on-premises collections (so as to collect metadata from any potentially deleted messages) is now contributing to additional delays, notwithstanding the continued efforts of both our clients and your vendor. As such, we still have yet to complete our collections.

We note this in hope that, as discussed below, should the need arise for an extension (which now seems probable, due to processing time alone) that you will work with us in good faith. We are, to the extent it helps, glad to discuss mutually agreeable solutions to help mitigate any issues, including rolling productions of documents.

Alternatively, to the extent that you are willing to drop your request for an on-premises collection, we could proceed remotely, which may provide us with a more workable schedule.

Please let us know if you would like to confer regarding any of the above. We will keep you apprised as this continues to develop.

Best,
Dan

—
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

From: Bender, Kristin <KBender@willkie.com>
Sent: Thursday, June 26, 2025 11:37 AM
To: Breed, Maxwell <MBreed@pryorcashman.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>
Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>
Subject: Re: Case/Koslow Subpoenas - Lighthouse

Thanks, Max. We will certainly do our best to work with you.

—
On June 26, 2025 at 11:20:52 AM EDT, Breed, Maxwell <MBreed@pryorcashman.com> wrote:

*** EXTERNAL EMAIL ***

Thank you, Kristin. Pardon the direct tone, but we are reliant on your team to provide us a collection and hosting vendor so that we can comply with the ordered deadline. We've yet, two days after the hearing, to be put into a position where we can collect data to review. If the data set proves to be too large to review in the time that you leave us, we trust that you'll work with us to alleviate the burdens to which your timing has subjected us. We'll, of course, involve the court as needed.

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 Please consider the environment before printing this email.

From: Bender, Kristin <KBender@willkie.com>

Sent: Thursday, June 26, 2025 11:14 AM

To: Breed, Maxwell <MBreed@pryorcashman.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SRoeser@manatt.com>
Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>
Subject: Re: Case/Koslow Subpoenas - Lighthouse

Hi Max,

As Michaela explained to you, you were connected with Lighthouse as soon as was feasible and we are not interacting with your independent project managers and team. However, we have emphasized and made clear the necessarily expeditious nature of this project. I presume you are in contact with your dedicated team and can do the same. If you wish to discuss intractable issues with timing, that would be appropriate only once those issue arise. I do not take your emails to be representing that July 7 is no longer feasible, nor does that premature assessment seem correct. We do not appreciate your demands or your tone, nor are we in a position to revise the Court's order at this point. I can assure you that we want these documents as soon as possible. If there is something you think we can do to assist you, please let us know and we will do our earnest best.

Regards,
Kristin

—
On June 26, 2025 at 10:59:34 AM EDT, Breed, Maxwell <MBreed@pryorcashman.com> wrote:

*** EXTERNAL EMAIL ***

Now we're up to two additional days that we'll need as a result of plaintiff-side delay. We can't review or produce what we can't collect.

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From: Breed, Maxwell
Sent: Wednesday, June 25, 2025 3:10 PM
To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Bender, Kristin <KBender@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>
Cc: Enkeshafi, Parmida <penkeshafi@pryorcashman.com>
Subject: RE: Case/Koslow Subpoenas - Lighthouse

We trust that you will agree to extend our production deadline by one day for every day you delay our collection. The total is now one. Thank you.

MAXWELL BREED

Partner

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 Please consider the environment before printing this email.

From: Pohlman, Daniel J. <dpohlman@pryorcashman.com>
Sent: Wednesday, June 25, 2025 3:08 PM
To: Connolly, Michaela <MConnolly@willkie.com>; Bender, Kristin <KBender@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>
Cc: Enkeshafi, Parmida <Penkeshafi@pryorcashman.com>; Breed, Maxwell <MBreed@pryorcashman.com>
Subject: RE: Case/Koslow Subpoenas - Lighthouse

All, we still have not received a response on this.

—
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

From: Connolly, Michaela <MConnolly@willkie.com>
Sent: Tuesday, June 24, 2025 6:24 PM
To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Bender, Kristin <KBender@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>
Cc: Enkeshafi, Parmida <Penkeshafi@pryorcashman.com>
Subject: RE: Case/Koslow Subpoenas - Lighthouse

Hi Dan,

We are identifying the appropriate point of contact at our vendor (Lighthouse) and will circle back early tomorrow.

Best,
Michaela

Michaela Connolly
Willkie Farr & Gallagher LLP
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mconnolly@willkie.com | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)
Pronouns: she, her, hers

From: Pohlman, Daniel J. <dpohlman@pryorcashman.com>
Sent: Tuesday, June 24, 2025 5:02 PM
To: Bender, Kristin <KBender@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>
Cc: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>
Subject: Case/Koslow Subpoenas - Lighthouse

|| ***** EXTERNAL EMAIL *****

Hi all,

Could you please put us in contact with your vendor so we can arrange for collection?

Thank you!

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